

**FILED**

March 08, 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

BY: Julie Golden  
DEPUTY

**UNITED STATES OF AMERICA**

**v.**

**PAUL KRUSE,**

*Defendant.*

**No. 1:20-CR-00249-RP**

The United States Charges:

**THE DEFENDANT**

1. At all times relevant to this Information, Defendant PAUL KRUSE was the president and chief executive officer of Blue Bell Creameries ("Blue Bell") and worked at the company's Brenham, Texas headquarters. Blue Bell's sales, marketing, quality, and other departments all reported to PAUL KRUSE.

**COUNT 1**

21 U.S.C. §§ 331(a) and 333(a)(1)  
(Introducing adulterated foods into interstate commerce)

2. Between on or about January 1, 2015, and on or about March 13, 2015, in the Western District of Texas, the Defendant, PAUL KRUSE, caused to be introduced and delivered for introduction into interstate commerce, from Brenham, Texas to Lexington, South Carolina, Wichita, Kansas, and other locations outside of Texas, foods, namely ice cream

products, that were adulterated: (i) within the meaning of Title 21, United States Code, Section 342(a)(1), in that they contained a poisonous or deleterious substance, namely *Listeria monocytogenes*, that rendered the foods injurious to health; and (ii) within the meaning of Title 21, United States Code, Section 342(a)(4), in that they had been prepared, packed, and held under conditions whereby they may have become contaminated with *Listeria monocytogenes*, all in violation of Title 21, United States Code, Sections 331(a) and 333(a)(1).

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/s/\_\_\_\_\_

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